

August 25, 2009

US EPA RECORDS CENTER REGION 5



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Dear Mr. Ohl:

Subject: Response to U.S. EPA Comments  
and Revised Removal Action Report  
Former EaglePicher Incorporated Facility  
200 Van Buren Street  
Delta, Ohio  
CEC Project No. 070-847

On behalf of Bunting Bearings, LLC (Bunting), Civil & Environmental Consultants, Inc. (CEC) respectfully presents a response to comments provided by the United States Environmental Protection Agency (U.S. EPA) in a letter on June 8, 2009, regarding U.S. EPA's review of a draft Removal Action Report (RAR) (dated February 2, 2009) for the former EaglePicher Incorporated facility located at 200 Van Buren Street in Delta, Ohio. CEC also presents a revised RAR incorporating U.S. EPA comments where applicable.

U.S. EPA comments are presented below in bold italic typeface, and responses to comments are presented in regular typeface. References to revised sections of the RAR are also presented. Revised sections of the RAR are presented in bold.

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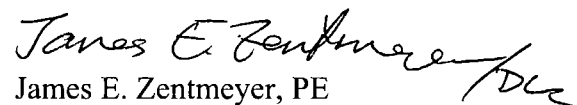


If you have any questions regarding this request for time extension or the removal action in general, please call.

Respectfully,

CIVIL & ENVIRONMENTAL CONSULTANTS, INC.

  
David L. Click, CPG  
Senior Project Manager

  
James E. Zentmeyer, PE  
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cc: John Hilbert – Shumaker, Loop & Kendrick, LLP  
Craig Melodia – U.S. EPA  
Archie Lundsey – Ohio EPA  
Om Patel – Weston Solutions, Inc.

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If you have any questions regarding this response to U.S. EPA comments, the revised RAR, or the removal action in general, please contact Mr. Jack Hilbert of Shumaker, Loop & Kendrick, LLP at (419) 321-1390.

Respectfully,

CIVIL & ENVIRONMENTAL CONSULTANTS, INC.

David L. Click, CPG  
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cc: John Hilbert – Shumaker, Loop & Kendrick, LLP  
Craig Melodia – U.S. EPA  
Archie Lundsey – Ohio EPA  
Om Patel – Weston Solutions, Inc.

**Response to U.S. EPA Comments presented in a letter dated June 8, 2009  
Regarding a Draft Removal Action Report dated February 2, 2009  
Former EaglePicher Incorporated Site, Delta, Ohio  
Administrative Order by Consent (AOC) Docket No. V-W-98-C-458**

1. **General Comment:** Throughout Sections 3 and 4, descriptions of removal and sampling activities have been provided which are difficult to follow without locations and samples depicted on Figures. Provide figures depicting the locations along with the description.

Civil & Environmental Consultants, Inc. (CEC) has prepared Figure 4, which illustrates onsite Removal Action (RA) activity locations and verification soil sampling locations. Also, Figure 3 has been renamed for reference to offsite RA areas and verification sampling locations.

2. **General Comment:** The locations of verification samples collected during removal action should be shown on a figure. Provide figure(s) showing locations of verification samples.

See above response.

3. **General Comment:** Provide photo-documentation for the Removal Action.

Photo-documentation from the RA is provided in Appendix II.

4. **Page 8:** The last paragraph on Page 8 states that Alternative 5, excavation and hazardous landfill disposal, was the selected method of on-site soil remediation and disposal. However, the method used during the excavation and disposal of the on-site soil, on-site stabilization and solid waste landfill disposal, was the method used during the removal action. This needs to be clarified in the report.

The last paragraph on Page 8 has been modified accordingly to indicate that Alternative 3 (In-situ stabilization of on-site soil and foundry sand with stabilization agent and excavation and landfill disposal as a solid waste) was the selected alternative.

5. **Page 16, Section 4.1.3:** The second paragraph of this section states that "a correlation was developed between TSP airborne lead concentrations and mini-RAM airborne particulate matter concentrations." However, the specific action level developed through this correlation is not stated in this section, nor is it mentioned how long the exceedance would last before CEC would institute additional dust suppression and engineering controls.

Documentation regarding the specific correlation developed between the TSP airborne lead concentrations is not available. Engineering controls (i.e., misting) were implemented if dusty conditions were generated during removal and/or stockpiling. Section 4.1.3 of the RA Report has been modified accordingly.

6. **Page 44, Section 4.6.3:** This section provides descriptive information on the samples that CEC collected from the Fewless Creek culvert on September 12 and 19, 2002, but does not provide any descriptive information on the sample that CEC collected on October 24, 2002 (VCD-15-0.5). CEC should amend this section to include the pertinent information on this sample.

Section 4.6.3 has been revised accordingly to describe the sample location for VCD-15-0.5.

7. **Page 49, Section 4.7.1:** In the third paragraph, CEC states that the five verification samples collected from Area P3 were analyzed for lead. However, based on the chain-of-custody Com) shown in the analytical documentation (see enclosed CD-ROM) sample VNP3-05-6.0 was not analyzed for total lead. As such, CEC should review the report and state, specifically, which verification soil samples were or were not analyzed for total lead.

Sample VNP3-05-6.0 was analyzed for volatile organic compounds (VOCs), polychlorinated biphenyls (PCBs), and polynuclear aromatic hydrocarbons (PAHs) because of the presence of apparent oily-like material in the excavation soil. As shown in the analytical data, this sample did not contain these compounds at levels of concern. Since VNP3-01 through VNP-04 had been already collected as planned, analysis of VNP-5 for total lead was not necessary. The RA Report has been revised accordingly.

8. **Page 52, Section 4.7.3.2:** Based on the available chain-a-custody forms for Building A-4, CEC collected four additional samples (VNA4-08-4.15, VNA4-09-4.15, VNA4-10-4.15, and VNA4-11-2.0) for total lead analysis. However, CEC does not provide any information, in Section 4.7.3.2, on these four samples, even though the analytical results for these samples are provided in Table 6. As such, (CEC should review the analytical documentation to ensure that CEC provides information on all of the samples collected from each of the site buildings.

The subject verification soil samples (VNA4-08-4.15, VNA4-09-4.15, VNA4-10-4.15, and VNA4-11-2.0) were collected from the northern limit of Building A-4 on September 13, 2002. These verification samples were collected after soil was excavated from this area that connects Buildings A-3 and A-4. Section 4.7.3.2 of the RA Report has been revised accordingly.

9. **Page 53, Section 4.7.4:** The third paragraph of this section states that the foundations within Building A-4 were encapsulated with Lead Barrier Compound prior to the backfilling of Building A-4. This procedure was also used for Building A-5; however, no mention is made of this in the section that pertains to Building A-5 (Section 4.7.3.1).

Section 4.7.3.1 of the RA Report has been revised to indicate that Lead Barrier Compound was also used on the foundations of Building A-5.

10. **Page 56, Section 4.7.4:** This section states that ENTACT demolished Buildings B-16 through B-20 during the initial stage of the Phase 4 activities. However, there is no designation for Building B-17 on the attached site diagram (Figure 2).

Figure 2 has been revised to indicate the former location of Building B-17. Of note, Building B-17 was formerly a small desk room between former Buildings B-9 and B-19, and as such, no verification soil sample designations were associated with B-17.

11. **Page 68, Section 4.7.7.3:** In the second paragraph of this section, CEC lists the samples collected from the eastern portion of the South Yard. On the same day that CEC collected VNSY-01-50", it also collected Sample VNB23-01-33" (presumably from Building B-23). However, no Building B-23 is shown in Figure 2 (Site Layout), nor is any information given in the report concerning this sample.

Figure 2 has been revised to indicate the former location of Building B-23 (former Baghouse "D"). Also, Section 4.7.7.3 of the RA Report has been revised to indicate collection of samples from former Building B-23.

Also, this paragraph states that, beginning on April 12, 2004, CEC collected Sample VNSY-02-36". However, this sample was actually collected on March 10, 2004. The sample that CEC collected, beginning on April 12, 2004, was VNSY-02-40". The sample names listed in this paragraph do not match the names provided on the chain-of-custody form provided on the CD-ROM (A4D130105.pdl) for April 12, 2004.

Section 4.7.7.3 of the RA Report has been revised to indicate the appropriate sampling dates in the South Yard Area.

12. **Page 69, Section 4.7.7.4:** In the third paragraph of this section. CEC discusses the results of the PCB and asbestos samples that CEC collected from Building B-25, However, Table 20 does not provide the analytical results for the samples that CEC used to determine the PCB and asbestos levels in Building B-25 (B25-Chip-1, B25-Chip-2, and B25-Chip-3). CEC should add the results for these samples to Table 20.

Laboratory analytical results for concrete chip samples (B25-Chip-1, B25-Chip-2, and B25-Chip-3) from former Building B-25 and laboratory results for asbestos samples collected from former Building B-25 cannot be located. A monthly progress report from April 2004; however, indicates that PCBs were detected at concentrations less than 1 mg/kg and asbestos was not detected above the laboratory quantitation limit.

13. **Page 85, Section 4.12:** Provide figure showing areas of deed restriction.

Appendix III (Deed Restricted Areas) also shows areas of deed restriction at the Site.

14. **Figure 2, Site Layout:** This figure does not show the field of VOC-impacted soil that exists to the east of, and under, Building A-3. Also, CEC did not provide a diagram or diagrams that show the points from which CEC collected the soil cleanup verification samples.

Appendix III also shows the area of VOC-impacted soil east of, and under, Building A-3. RA verification soil sample locations are presented in Figure 4.

15. **Figure 3, Removal Action Area of Offsite Removal:** This figure should be updated so that (1) Plant 1 and Plant 2 properly reflect the demolition of specific site buildings (B-16 through B-20, B-1 through B-7, B-1A, B-1D, B-1E, B-24, and B-25) and (2) the excavation area (beige color) properly reflects the entire on-site area where excavation of impacted soil took place.

Figure 4 has been created to properly show the current configurations of Plants 1 and 2, to account for the demolition of former locations of Buildings B-16 through B-20, B-1 through B-7, B-1A, B-1D, B-1E, B-24, and B-25. In addition, Figure 4 shows the onsite excavation areas.